

**PROBABLE CAUSE FOR CRIMINAL COMPLAINT**

1. I, Aaron Eastham, am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed since 2018. I am currently assigned to the Detroit Field Office, Grand Rapids Resident Agency. During my employment with the FBI, I have conducted investigations involving violations of federal criminal laws, including violations related to child exploitation and pornography. I am familiar with the various statutes of Title 18, United States Code, Chapter 110 – sexual exploitation and other abuse of children, including violations pertaining to distribution or receipt of child pornography (18 U.S.C. § 2252A(a)(2)) and possession of child pornography (18 U.S.C. § 2252A(a)(5)(B)).

2. The facts in this Continuation of Criminal Complaint are based on my personal observations, my training and experience, and information obtained from other agents and witnesses. I submit the following to establish probable cause to believe that Thomas Hungerford (“HUNGERFORD”) has committed violations of distribution of child pornography (18 U.S.C. § 2252A(a)(2)), the “subject offense.” This Continuation of Criminal Complaint is intended merely to show probable cause that HUNGERFORD committed the subject offense and does not set forth all of my knowledge concerning this matter.

3. While reviewing the contents of a cellphone that was seized during a child pornography investigation by the FBI’s Omaha division, communications were

found on the messaging application Session<sup>1</sup> between the subject of the Omaha Division's investigation ("OmSub") and a user identified as "Barry Sanders," who was later identified as THOMAS HUNGERFORD.

4. The messages between OmSub and HUNGERFORD began on November 5th, 2023, and ended on March 8th, 2024. The conversation included 2,328 messages and 679 media files, many of which were child pornography.

5. The chats between HUNGERFORD and OmSub began with HUNGERFORD introducing himself from iMGSR<sup>2</sup>, saying he was "Bsanders," "Barry," or "Giggy." The two discussed their affiliation for pedophilia:

a. **Hungerford:** Have you admitted to yourself yet that you're a pedo?

b. **Hungerford:** Took me a long time and i denied it to myself forever.

But when I finally admitted to myself that I am a pedo it's been like an awakening

c. **Hungerford:** I actually embrace it now

6. HUNGERFORD told OmSub that he had lots of non-nude images or videos of children but had nude ones as well. During the course of their chats, HUNGERFORD sent OmSub several child pornography files, including the ones listed below:

a. On 2/1/2024 at 10:51:08 AM(UTC+0), HUNGERFORD sent a video

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<sup>1</sup> Session is a free, cross-platform, end-to-end encrypted messaging application that emphasizes user privacy and anonymity. It uses Dark web technology to provide users with security and privacy.

<sup>2</sup> iMGSR refers to Image Source, which is an Australian photo sharing website.

that depicts a prepubescent female, approximately 6-8-years-old, however, her actual age is unknown to investigators. She has brown hair and is laying on a bed, completely nude except for pink socks. She has a rabbit stuffed animal that she is holding. She appears to be crying. An adult male spreads the girl's legs apart and she puts the ears of the stuffed animal into her mouth. The male then engages in vaginal intercourse with the child. She appears to be in pain and is screaming while biting down on the rabbit's ears while the male has sex with her.

- b. On 11/06/2023 at 2:04:05 AM(UTC+0), HUNGERFORD sent a video depicting a minor female, approximately 9-12-years-old, but whose actual age is unknown to investigators, wearing a Mickey Mouse shirt and orange and grey shorts. In the video the girl kisses an adult man on the lips while sitting on his lap. She then lays down on a bed and the man pulls her shorts to the side and performs oral sex on the girl.
- c. On 1/31/2024 at 8:00:15 PM(UTC+0) HUNGERFORD sent a video that depicts a prepubescent blonde female, completely nude except for a gold necklace and socks. She is sitting in front of the camera and making various hand gestures. At several points in the video, she spreads her legs apart and her vagina is clearly visible.

7. HUNGERFORD and OmSub talked about their predilection for prepubescent girls, and what they would do if they were ever “lucky” enough to have

access to a girl. Around 11/10/2023, HUNGERFORD sent the message, “I wanna touch a preteen sooooo bad!!!!” On or about 11/15/2023, HUNGERFORD sent a message about a friend who had a daughter he was interested in: “We have some friends who’s daughter is SMOKING HOT!! She’s a gymnast. I wanna Fick her petite young teen body so bad!!!!”

8. Around 11/29/2023, HUNGERFORD told OmSub how he masturbated while watching videos depicting child pornography. HUNGERFORD sent OmSub two images that depicted a child’s leotard laid out on a white t-shirt on top of what appeared to be a footstool or ottoman. A tablet, which appeared to be an Apple iPad in a black/brown case, is propped up on the ground in front of the leotard. The screen of the tablet depicts what appears to be a prepubescent girl lifting up her shirt and exposing her nipple. A few messages later, HUNGERFORD explained the photos and sent the message: “So that’s my wife’s exercise ball thing. I put down an old T-shirt to catch my cum then I put the silky sexy Leo down with a hot video on my iPad. Then I lay down on that silly leotard with my raging hard on and hump it. While I’m watching my preteen video”.

9. On or about 1/23/2024, after HUNGERFORD sent a non-nude video depicting a prepubescent female child walking two dogs and doing gymnastic moves, wearing a one-piece bathing suit or leotard. He also sent a voice message. In the voice message, a male’s voice can be heard whispering “I want to touch that little girl in a really bad bad way.” A few messages later he asked OmSub if he heard his voice text.

10. On or about 1/30/2024, HUNGERFORD and OmSub discussed if they would ever sexually abuse a child. HUNGERFORD said, “Awful tempting. I think I might if she was drugged. That way nobody could find out”.

11. HUNGERFORD also discussed going to public locations, such as gymnastic studios, to watch and video/photograph young girls in tight clothing, such as leotards or leggings. On or about 11/06/2023, HUNGERFORD told OmSub that he was watching children outside of a dance studio:

a. **Hungerford:** Sitting here outside the dance studio 🖱👉👉👉

b. **Hungerford:** Parking lot

c. **OmSub:** Nice

d. **OmSub:** Any sweethearts?

e. **Hungerford:** Mmmmm omg yes

f. [a few messages later] **OmSub:** So did you get any pictures from the dance studio? Hungerford: Oh that right you asked me that earlier.

No I could've but was a bit too far away. I kinda park outside of where the parents are all parked for obvious reasons. I can see them coming and going ALOT better but they're a bit farther away. Next time I'm going right into the mix

12. Between November 2023 and March 2024 HUNGERFORD also sent messages about looking into the windows of minor girls and eventually breaking into their home and stealing their underwear. He claimed that he had recorded sexual videos of one of the girls with her boyfriend:

- a. **Hungerford:** I've been window peeping tonight 🐱
- b. **OmSub:** Really
- c. **OmSub:** See anything?
- d. **Hungerford:** Mmmmm yes
- e. **Hungerford:** [Sends a file that was not recovered.]
- f. **Hungerford:** Have I told you about this yet?
- g. **OmSub:** Wow nice
- h. **OmSub:** Yum
- i. **OmSub:** She has a beautiful ass
- j. **Hungerford:** Fuck yes she does. High school
- k. **Hungerford:** Have I told you about this yet?
- l. **OmSub:** No do tell
- m. **Hungerford:** I've been spying on her and her younger sister for about 6 months. It's just been a bit since I peeped on her
- n. **Hungerford:** I recorded her in a VERY intimate moment with her and her boyfriend

13. HUNGERFORD later elaborated that the “intimate moment” he recorded involved the girl being digitally penetrated by her boyfriend.

14. HUNGERFORD also sent messages on several dates in which he claimed he had attempted to watch the girls through their windows at night. He said he believed that the younger girl was either a freshman or sophomore in high school and the older girl was probably a senior in high school.

15. On or about 12/24/2023, HUNGERFORD claimed he broke into the girl's home while the family was away. He sent images of girl's clothes, including underwear, which he said he stole from the older girl's bedroom. He said he was thinking about going back, while the family was not home, because he wanted to "take advantage and get inside the younger ones BR." During the chat, HUNGERFORD indicated that he resides on a lake in Western Michigan and said he worked as a construction superintendent.

16. On May 02, 2024, FBI obtained subscriber information relating to iMGSRG for the user "bsanders" and identified numerous internet protocol (IP) addresses associated with the account. A specific IP address, 68.32.143.121, was used the "bsanders" account at iMGSRG on February 15th, 2024, at 9:20:58 PM CST and February 17th, 2024, at 4:54:58 AM CST. Additionally, the "bsanders" iMGSRG account contains multiple "albums" indicating the accountholder is interested in child erotica. For example, one folder is named "Niece – preteen 9 to 11 yo ..... my favorite niece Piper".

17. On May 02, 2024, an administrative subpoena was served to Comcast regarding the use of IP address 68.32.143.121 on February 15th, 2024, at 9:20:58 PM CST and February 17th, 2024, at 4:54:58 AM CST. Comcast responded to the subpoena and provided the following subscriber information for the abovementioned IP address.

a. **Subscriber Name:** Ami Hungerford.

b. **Service Address:** 3588 Big Rock Ct SW, Grandville, MI 49418.

c. **Type of Service:** Internet

18. THOMAS HUNGERFORD was identified as the spouse of Ami Hungerford.

19. Investigators conducted an open-source database search for the name Thomas Hungerford, yielding a single individual in Michigan: Thomas Aaron Hungerford, born in 1970. Further queries of commercial, open-source, and law enforcement-sensitive databases were conducted on this individual, yielding a Michigan driver's license (H526792028339) with a registered address of 3588 Big Rock Ct SW, Grandville, MI 49418. As of May 21<sup>st</sup>, 2024.

20. On 5/23/2024, investigators conducted a noncustodial interview of HUNGERFORD. HUNGERFORD admitted to having child pornography on his cellular phone, tablet, as well as stored on two USB drives that were in his pocket.

21. He admitted to being attracted to girls between the ages of 8-14-years-old and admitted to taking photos of children in public places, such as parks and stores. He also watched children from the parking lot of dance studios.

22. During the interview, HUNGERFORD admitted that he broke into the homes of two families, with children between the ages of 9 and 18-years-old and stole various clothing items and underwear from children living there. One of the homes he watched the minors through the window at night on several occasions and claimed that he recorded a video of a girl who he thought was 16 or 17-years old. He also admitted to entering the girl's locker room of a high school, at an afterschool event, and stealing underwear from the lockers. HUNGERFORD acknowledged



using the “bsanders” account on iMGSRG and “barrysanders” on Session.

HUNGERFORD said he used these accounts from home and occasionally at work, which is also within the Western District of Michigan.

23. On 5/23/2024, the FBI executed a search warrant on HUNGERFORD’s home. Numerous pairs of children’s underwear and clothing were found in the home.

24. On 5/23/2024, the FBI conducted an initial preview of the USB drives that were found in HUNGERFORD’S pockets. Multiple folders were observed with names indicative of child pornography and child pornography websites. Within some of the folders, images and movies were observed that were of probable known child pornography victims according to the National Center of Missing and Exploited Children.

### **CONCLUSION**

25. Based on the foregoing, I believe there is probable cause to believe that Thomas Hungerford has committed the criminal violation of distribution of child pornography (18 U.S.C. § 2252A(a)(2)).